

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,

Plaintiff,

v.

XILINX, INC.,

Defendant.

C.A. No. 20-1228-CFC-JLH
C.A. No. 20-1229-CFC-JLH
C.A. No. 20-1231-CFC-JLH
C.A. No. 20-1232-CFC-JLH
C.A. No. 20-1233-CFC-JLH

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME

WHEREAS, the parties’ proposed Protective Order and proposed Stipulation and Proposed Order Regarding Discovery, Including Discovery of Electronically Stored Information (“ESI Order”) are due to be filed by August 25, 2021;

WHEREAS, the parties would benefit from additional time to negotiate the provisions of the proposed Protective Order and proposed ESI Order to try and resolve disputes;

WHEREAS, the parties have agreed, subject to the approval of the Court, that if there are any remaining disputes regarding the proposed Protective Order or proposed ESI Order that they will file a Motion for Teleconference to Resolve [Discovery/Protective Order] Disputes, pursuant to the paragraph 8(g) of the Scheduling Order, by August 27, 2021;

WHEREAS, the parties have agreed, subject to the approval of the Court, that any disputed provisions of the proposed Protective Order and proposed ESI Order shall be submitted to the Court through one round of simultaneous 3-page letter briefs, which shall be submitted to the Court by 10:00 am on September 1, 2021; and

WHEREAS, the parties respectfully request, subject to the approval of the Court, that any disputes regarding the proposed Protective Order and proposed ESI Order be heard during the Scheduling Conference to take place on September 3, 2021.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through the undersigned counsel and subject to the approval of the Court, as follows:

(1) The parties will file the proposed Protective Order and ESI Order or the Joint Motion for Teleconference on August 27, 2021;

(2) If necessary, the parties will file one round of simultaneous 3-page letter briefs for any proposed Protective Order or proposed ESI Order disputes by 10:00 am on September 1, 2021; and

(3) If necessary, any disputes will be heard at the September 3, 2021 Scheduling Conference.

Dated: August 25, 2021

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SO ORDERED this _____ day of August, 2021.

United States Magistrate Judge